1	NICHOLAS A. TRUTANICH United States Attorney		
2	Nevada Bar Number 13644		
3	JARED L. GRIMMER Assistant United States Attorney		
	501 Las Vegas Boulevard South, Suite 1100		
$4 \mid$	Las Vegas, Nevada 89101 Telephone: 702-388-6378		
5	jared.1.grimmer@usdoj.gov		
6	Attorneys for Plaintiff The United States of America		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	UNITED STATES OF AMERICA,	Case No. 2:21-mj-00021-EJY	
0	Plaintiff,	Stipulation for an Order Directing Probation to Prepare	
11	v.	a Criminal History Report	
12	JUAN BARRO-CHAVELAS,		
13	Defendant.		
4			
15	IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.		
16	Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States		
17	Attorney, counsel for the United States of America, and Robert O'Brien, Assistant Federal		
18	Public Defender, counsel for Defendant JUAN BARRO-CHAVELAS, that the Court direc		
19	the U.S. Probation Office to prepare a report detailing the defendant's criminal history.		
20	This stipulation is entered into for the following reasons:		
21	1. The United States Attorney's Office	e has developed an early disposition	
22	program for immigration cases, authorized by the Attorney General pursuant to the		
23	PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has		
24			

1	extended to the defendant a plea offer in which the parties would agree to jointly request ar	
2	expedited sentencing immediately after the defendant enters a guilty plea.	
3	2. The U.S. Probation Office cannot begin obtaining the defendant's criminal	
4	history until after the defendant enters his guilty plea unless the Court enters an order	
5	directing the U.S. Probation Office to do so. Such an order is often entered in the minutes o	
6	a defendant's initial appearance when charged by indictment.	
7	3. The U.S. Probation Office informs the government that it would like to begin	
8	obtaining the criminal history of defendants eligible for the early disposition program as	
9	soon as possible after their initial appearance so that the Probation Office can complete the	
10	Presentence Investigation Report by the time of the expected expedited sentencing.	
11	4. Accordingly, the parties request that the Court enter an order directing the	
12	U.S. Probation Office to prepare a report detailing the defendant's criminal history.	
13	DATED this 26th day of January, 2021.	
14		Respectfully submitted,
15		NICHOLACA TRUTANICH
16		NICHOLAS A. TRUTANICH United States Attorney
17	/s/ Robert O'Brien	/s/ Jared L. Grimmer
18	ROBERT O'BRIEN Assistant Federal Public Defender Counsel for Defendant JUAN BARRO- CHAVELAS	JARED L. GRIMMER Assistant United States Attorney
19		
20		
21		
22		
23		
24		

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

1 2 3 UNITED STATES OF AMERICA, Case No. 2:21-mj-00021-EJY 4 Plaintiff, **Order Directing Probation to Prepare** a Criminal History Report 5 [Proposed] v. 6 JUAN BARRO-CHAVELAS, 7 Defendant. 8 9 Based on the stipulation of counsel, good cause appearing, and the best interest of 10 justice being served: 11 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history. 12 13 DATED this 27th day of January, 2021. 14 15 UNITED STATES MAGISTRATE JUDGE 16 17 18 19 20 21 22 23

24